

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:
CAROL MARTUCCI,	:
	:
Plaintiff,	:
	:
- vs. -	:
	:
HARTFORD LIFE INS. CO.	:
	:
Defendants.	:
-----X	

10 CV 6231 (BSJ)(RLE)

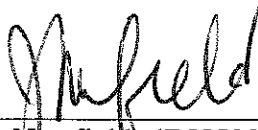
**DECLARATION OF  
JASON NEWFIELD**

Pursuant to 28 U.S.C. § 1746, Jason Newfield states as follows:

1. I am a Partner with Frankel & Newfield, P.C. and I am counsel of record for the Plaintiff, Carol Martucci, in this matter.
2. This declaration is respectfully submitted in support of Plaintiff's application for an extension of the end date for discovery, currently set for April 21, 2011, to be extended for thirty (30) days.
3. Counsel for Defendant has consented to this request for a thirty (30) day extension.
4. Defendant has provided its initial responses to discovery, and has provided Plaintiff with a Stipulated Protective Order, which is being submitted to the Court.
5. However, Defendant has not yet produced documents which will be produced, pending the Court's approval of the Stipulated Protective Order.
6. In addition, there may be discovery disputes to bring before the Court.
7. Accordingly, good cause exists to extend the discovery cut off date by an additional thirty (30) days.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 20, 2011  
Garden City, New York

  
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Jason Newfield (JN5529)